

BROWN & ROSEN LLC

Attorneys At Law
100 State Street, Suite 900
Boston, MA 02109
617-728-9111 (T)
www.brownrosen.com

July 2, 2025

VIA ECF

The Honorable Dale E. Ho
United States District Judge
United States District Court
for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: Drum Major Music Entertainment, Inc., et al. v. Universal Music Group, Inc.,
1:25-cv-04334-DEH (S.D.N.Y.)

Dear Judge Ho:

The undersigned represents Plaintiffs Drum Major Entertainment, Inc. and Darius Harrison in the above-referenced lawsuit. I am writing with the consent of UMG Recordings, Inc. (“UMG”) (named herein as “Universal Music Group, Inc.”) to jointly request a 90-day extension of UMG’s time to respond to the Complaint filed in this action. The parties are currently engaged in global and extensive settlement discussions, which we believe will resolve the case in its entirety. The requested extension will allow the parties to complete their negotiations without expending judicial resources or additional litigation costs and keep the goodwill the parties are developing during the negotiations.

This case was filed on May 22, 2025, and UMG was served on May 28, 2025. The parties had already agreed to an extension of UMG’s time to respond to the Complaint up to and including July 18, 2025. The parties now jointly request an extension of UMG’s time to respond up to and including **September 18, 2025**.

The parties also jointly request that the Court postpone the initial conference in this matter, which is currently scheduled for July 9, 2025, to a date after September 18, 2025, at which point the parties will be able to report their progress to the Court. Of course, we will apprise Your Honor before that time if the parties are able to conclude a settlement.

This is the parties’ first request for an extension of time in this matter. The request does not affect any scheduled dates other than the initial conference.

Sincerely,
Christopher Brown
Christopher Brown